

1 sexual abuse alleged to have occurred in Alaska, with the Debtor paying \$5 million and
2 its insurers \$45 million to settle those claims.

3 2. On February 17, 2009 (the "Petition Date"), there were approximately 153
4 tort claims pending against the Debtor which were in various stages of litigation and
5 discovery. The Debtor had been advised by a number of attorneys that they had
6 additional clients with claims that had not been asserted. The Debtor also believes
7 there may be other claims that are beyond the knowledge of anyone currently involved
8 in this Chapter 11 proceeding.

9 3. One of the principal reasons for seeking relief under Chapter 11 was to
10 enable the Debtor to use the Chapter 11 process to address in a comprehensive
11 manner, and in one forum, all tort claims asserted against it, determine the extent of the
12 Debtor's liability with respect thereto, and address such claims, and all other claims
13 against the Debtor, in a fair and equitable manner.

14 4. The Debtor has developed a comprehensive notice program intended to
15 give notice of the claims bar date to both known and unknown creditors. In addition to
16 actual notice to known creditors, and publication notice to unknown creditors throughout
17 Alaska, Idaho, Montana, Oregon, and Washington (the "Oregon Province Territory"), the
18 Debtor also intends to provide publication notice in locations outside the Oregon
19 Province Territory where Oregon Province Jesuits, against whom allegations of child
20 sex abuse have been made, were working or studying. The Debtor has reviewed its
21 internal catalogues to determine where those Jesuits were located between 1950 and
22 the present. These locations have all been targeted for notice in a local newspaper of
23 general circulation. Finally, the Debtor intends to accomplish nationwide notice of the
24 Claims Bar Date by publication in *USA Today*, and by the media's nationwide
25 dissemination of one or more press releases to be issued by the Debtor.

1 5. Of the more than 394 claims asserted against the Debtor since June 2000,
2 approximately 99% of the claimants lived or resided in the five states encompassing the
3 Oregon Province Territory. The Debtor believes that any presently unknown potential
4 claimants are more likely than not to reside in these same states. Of the remaining 1%,
5 the claimants lived in California, New York, and Virginia.

6 I declare under penalty of perjury under the laws of the United States of America
7 and the state of Oregon that the foregoing is true and correct.

8 Dated this 13th day of May, 2009.

9
10 */s/ Michael A. Tyrrell*

11 _____
Michael A. Tyrrell

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13 F:\CLIENTS\19620\004\BAR DATE NOTICE PROGRAM\DECLARATION OF FR. TYRRELL (FINAL FORM).DOC
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CERTIFICATE OF SERVICE

I, Janine E. Hume declare as follows:

I am employed in the County of Multnomah, State of Oregon; I am over the age of eighteen years and am not a party to this action; my business address is 1000 SW Broadway, Suite 1400, Portland, Oregon 97205-3089, in said County and State.

I certify that on May 13, 2009, I served, via first class mail, a full and correct copy of the foregoing **DECLARATION OF MICHAEL A. TYRRELL**, on the parties of record, addressed as follows:

See attached service list.

I also certify that on May 13, 2009, I served the above-referenced document(s) on all ECF participants as indicated on the Court's Cm/ECF system.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 13, 2009

/s/ Janine E. Hume

Janine E. Hume, Legal Assistant

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